

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MICHAEL TILLMAN
Plaintiff, Pro-Se

JOHN PAUL SMITH
Plaintiff, Pro-Se

DONALD F. BLIZZARD, SR.
Plaintiff, Pro-Se

v.

JOHNSONDIVERSEY, INC.
[Incorrectly identified as "Johnson
Divsersay, Inc."]
Defendant.

DOCKET NO: 04-CV-40107-GAO

**MOTION OF THE DEFENDANT,
JOHNSONDIVERSEY, INC.
FOR ADMISSION OF ATTORNEY PRO HAC VICE**

The defendant in the above-captioned matter, JohnsonDiversey, Inc., respectfully moves for the admission *pro hac vice* of Attorney Patrick G. Donnelly to practice in the above-captioned case.

Mr. Donnelly is a Shareholder in the law firm of Riordan, Donnelly, Lipinski & McKee, Ltd., 10 North Dearborn Street, Chicago, IL 60602, which coordinates the defense of JohnsonDiversey, Inc. in litigation. As such, Mr. Donnelly is closely familiar with the defendant's procedures, practices and products and will be able to enhance and facilitate the presentation of its case without delay or inconvenience to the plaintiffs.

Attached hereto and made part hereof is the Affidavit of Mr. Donnelly, affirming that he is a member in good standing of the bars to which he has been admitted.

WHEREFORE, the Defendant respectfully asks that its Motion to have Patrick G. Donnelly admitted pro hac vice be granted and for such other and further relief as this Court may deem just and proper.

The Defendant
JohnsonDiversey, Inc.,
By its Attorneys,

/s/ Philip M. Hirshberg

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